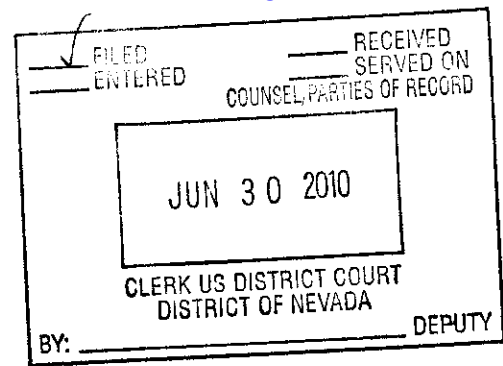


DANIEL G. BOGDEN  
 United States Attorney  
 JAMES E. KELLER  
 Assistant United States Attorney  
 100 West Liberty Street, Suite 600  
 Reno, Nevada 89501  
 (775) 784-5438  
 Facsimile: (775) 784-5181



**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARMELO MEDINA-MEDINA and  
 ENRIQUE SALAS-RAMIREZ,

Defendants.

No.

MOTION TO SEAL AND  
~~[PROPOSED]~~ SEALING ORDER

**3:10-cr-00076-ECR-VPC**

COMES NOW, the United States of America, by and through its attorneys, DANIEL G. BOGDEN, United States Attorney for the District of Nevada, and James E. Keller, Assistant United States Attorney, and moves for the sealing of the Indictment returned by the Grand Jury on or about June 30, 2010, in the above-captioned action, any arrest warrant and corresponding indictment paperwork, this instant motion to seal, and any corresponding Sealing Order until further Order of the Court.

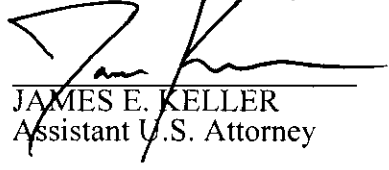
The government is presently entertaining the submission of applications to the Court for the search of two premises on Tybo Avenue, in Reno, Nevada, where defendants, or at least drug associates of the defendants, are believed to reside. Further, these premises, at 2290 Tybo Avenue and 2240 Tybo Avenue, respectively, are two locations where DEA agents believe controlled substances are stored and/or distributed. If the indictment against these defendants and corresponding indictment paperwork are revealed in the above-captioned action, it will likely cause them, as well as any individuals at either of these two premises, to flee or to conceal or destroy contraband (such as drugs) prior to the execution of search warrants, if any, at either premises. Such a response would jeopardize any potential for success as to execution of search warrants at either of these two premises and hinder the pending investigation into these

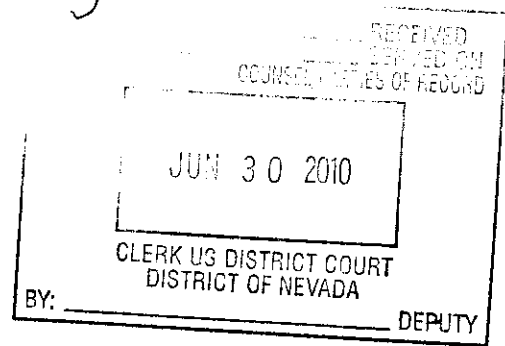
1 two premises, as well as the individuals in terms of drug activity, led by DEA. In addition, the government  
2 represents that DEA agents have identified measures taken on the part of at least one of the defendants to  
3 conceal drug activity. For instance, the drugs relating to the charges in the indictment in the instant case  
4 were recovered from a concealed compartment put in there by one of the defendants. Accordingly, the  
5 government moves to seal the indictment returned by the Grand Jury on or about June 30, 2010, in the  
6 above-captioned action, any arrest warrant and corresponding indictment paperwork, this instant motion  
7 to seal, and any corresponding Sealing Order until further Order of the Court. Finally, the government  
8 represents that it will not unduly delay in determining whether to seek these search warrants and that, once  
9 the named defendants are arrested and before the Court, the government will move to unseal the indictment  
10 in this action.

11 DATED this 30th day of June, 2010

Respectfully Submitted,

12 DANIEL G. BOGDEN  
13 United States Attorney

14   
15 JAMES E. KELLER  
16 Assistant U.S. Attorney  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

3:10-cr-00076-ECR-VPC

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARMELO MEDINA-MEDINA and  
ENRIQUE SALAS-RAMIREZ,

Defendants.

No.


SEALING ORDER

UNDER SEAL

Based upon the motion dated June 30, 2010, by the government, the representations made therein, and good cause showing, IT IS HEREBY ORDERED that the indictment, any arrest warrant and corresponding indictment paperwork, the government's motion dated June 30, 2010, and this Order be SEALED until further Order of the Court.

IT IS SO ORDERED.

Dated this 30<sup>th</sup> day of June, 2010.

  
HON. ROBERT A. McQUAID, JR.  
UNITED STATES MAGISTRATE JUDGE